

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 8**  
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July 22, 2003

Ref: 8EPR-SR

Mr. Chuck Roscoe  
Cabinet View Country Club  
PO Box 1562  
Libby, MT 59923

Dear Chuck:

Thanks for taking the time to meet with me last week. I hope this letter helps allay some of the concerns we discussed regarding potential EPA investigation or cleanup at the golf course.

As we discussed, EPA has been "advised" by several local residents that vermiculite or other materials from the vermiculite mine were used in construction of the golf course. To put that in perspective, in the course of the last year, we have received dozens of other suggestions on where to look for contamination. For each, we try to prioritize and provide a reasonable level of follow up without unnecessary concern. In some instances, this may mean sampling, in others it may not. Most suggestions do not turn out to be true, but some do.

At the golf course, most people stated that the contaminated material was used at depth below the greens several decades past, but some also stated material was present in the sand traps. Given the history, I felt that in the short-term a visual inspection of the course would be sufficient. Our experience is that we generally only find contamination where there are visible indications of vermiculite or other materials. We are also most concerned with materials at or near the soil surface that may cause exposure, so our sampling program is geared toward near-surface materials. I and other EPA workers have walked the course several times and have observed no visible vermiculite or other suspicious materials on the course. Due to my pathetic golf game, I have spent plenty of time inspecting the sand traps as well. Based on our experience and the inspection of the course, I decided there was no cause for concern and that no additional sampling was necessary in the short-term, though it was an issue I earmarked for eventual follow up.

You indicated that the club may renovate the greens (good idea!). Once contaminated materials at depth are disturbed or brought to the surface, they can become a health risk to workers and to persons using the area in the future. Given the plan to renovate the greens, and the realistic possibility that there is contaminated material at depth, we should move forward prudently to minimize any potential issues and deal with any contamination we may find in an




efficient manner. The last thing we want to do is to stumble into something unprepared when we have advance knowledge that can help us plan. With cooperation from the club, we can get the information we need in a low-key manner through a quick sampling effort. If contamination is discovered, we would work with the club to conduct any necessary cleanup in conjunction with the renovation and to limit any down-time. In the end, this may actually help the bottom line on the renovation, as we would perform all excavation and cleanup at our cost and leave you with a clean excavated area for reconstruction. We would also be taking advantage of an opportunity for remediation at a time when you already planned to shut down. Here is what I suggest:

1. It would be prudent for us to collect samples at depth from the greens. Based upon what I know now, I see no need to sample other locations. This would likely be done with a small, portable drill rig that collects soil cores. We can inspect for vermiculite and sample the soil for asbestos down to the maximum depth that may be disturbed without too much impact to the greens. The samples can be collected at a time that is most convenient for the club, such as end of season. It would likely take several days. We could perform this work later this year. It would be important to be thorough so you don't bump into something after we said it was clean.
2. If contamination is found below some or all of the greens, we would need to start coordinating on future renovation and cleanup. We may need to collect additional samples to determine the extent of any contamination. Ultimately, we would tailor our cleanup to your plans and the findings of our sampling and would coordinate closely with you on cleanup and renovation. There would be absolutely no need to shut down the golf course or take any drastic measures even if contamination is found until renovation and cleanup occurred. Cleanup may extend the duration of renovation, but not drastically.
3. If contamination is not found, the club could move forward with whatever plans you have, and we will provide a letter to that effect as well. This wouldn't mean that there isn't any chance of contamination, just that it isn't likely, so while renovation is occurring, we should collectively keep an eye out for contamination and perhaps conduct some sampling as well. We should be prepared to act in this scenario as well.

I hope this answers some of the questions you raised. I also hope that the potential presence of contamination and EPA involvement does dissuade you from your plans. Cleanup and investigation need not be a constant crisis and media target, and it need not take forever. My goal is to quietly and smartly go about our business of making Libby as safe as possible in the long-term with minimal disruptions to normal life. With cooperation from those affected, we usually can meet that goal. Please contact me in the future once the board or others have discussed this letter and we can follow up with a direct conversation. I would be glad to meet anytime I am in Libby. I can be reached through the EPA Information Center in Libby at 293-6194. Until then, keep hacking.

Sincerely,

A handwritten signature in black ink, appearing to read 'JCE', with a stylized, flowing script.

Jim Christiansen  
Superfund Project Manager